Comment Area: General Comments, Other Comments

Tritium Sampling & Analysis Plan (TSAP)

- The Tritium Sampling & Analysis Plan was prepared in response to the U.S. EPA request for additional samples of soil, surface water, sediment and ambient air.

- The plan was developed to be consistent EPA guidance for Superfund sampling, and to include stakeholder input.

- Based on previous stakeholder input, the plan included some additional elements not dictated by EPA guidance, e.g., vegetation sampling.

Ongoing Laboratory Program(s)

- The Laboratory currently has extensive environmental monitoring programs in air, water, soil, sediment, and vegetation, as required by federal, state, and local regulations, and DOE orders.

- Results are published in annual site environmental reports and are available at the UC Berkeley main library, Doe Library, second floor, or via the web at http://www.lbl.gov/ehs/epg/html/env_protection.htm

- Since 1991, within the framework of the Resource Recovery and Conservation Act (RCRA) corrective action program, the Lab has carried out an environmental investigation and restoration program. This program monitors groundwater, some surface water, and soils.

- Quarterly progress reports on the Lab's Environmental Restoration Program are prepared and reviewed with responsible regulatory agencies.

Task Force and Community Comments

1. Ensure that community requests are included and implemented. (6/1, p. 28, 16; 6/1, p. 60, 5)

2. Gather data by standardized protocols recognized by regulatory agencies. (See also OBT concerns below). (6/1, p. 57, 5 and 20; 6/1, p. 92, 19)

3. The sampling report should include a section describing NTLF operations during sampling time when reporting the results. (Franke/IFEU Report)

4. Add more information for a layperson reading the plan, i.e., why sample at this location, and what use will be made of the information being gathered, why rainwater? (6/1, p. 85, 13 ff.). Give more information on radioactivity (6/1, p. 86, 7 ff.). Try to make it more understandable to the community (6/1, p. 86, 21). How is a “technical analysis” of a potential monitoring site done, and how will we resolve the differences between the recommendations for more and for less sites? (8/10, p. 99, 20)

5. Sampling should be done for all of the radionuclides that have been used or manufactured at the facility during the past decades, and the site should be evaluated as a whole. (6/1, p. 97, 18 ff. and p. 98, 12; 8/10, p. 12, 14)

6. Appropriate models should be used to determine the probability of an individual at the fence line receiving a dose of greater than 10 mrem/yr (Franke/IFEU Report).

7. What does "nearby" mean? (8/10, p. 62, 22)

8. Some corrections to measurements of tritium in ambient air at a given location are necessary because of associated minor uncertainties. Report these uncertainties with the information. The amount of water collected in silica gel should be determined from the sampler weight difference rather than from the amount distilled in the laboratory. (Franke/IFEU Report)

9. A preliminary sampling effort for soil and groundwater around Calvin Lab is recommended (Franke). (8/10, p. 82, 24)

10. The sampling report should include a section describing NTLF operations during sampling time when reporting the results. (Franke/IFEU Report)

11. How do you know how much you've got on hand and what would happen in the event of a catastrophic concern like an earthquake? (8/10, p. 78, 12)